

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05cv11095NG

THOMAS ROY and *
LISA ROY *
v. *

DELAWARE NORTH *
COMPANIES, INC. – BOSTON *

PROPOSED DISCOVERY PLAN

1. All interrogatories and Rule 34 requests shall be served, responded to and completed by June 30, 2006.
2. Plaintiff's expert disclosures served by July 30, 2006.
3. Defendant's expert disclosures served by August 30, 2006.
4. Joinder of additional parties shall be brought on or before March 31, 2006.
4. Any motion pursuant to Fed. R. Civ. P. 56 shall be filed on or before August 30, 2006.

Counsel hereby certify that they have conferred with the parties relative to the use of alternative dispute resolution and the parties are amenable to said resolution.

Dated: July 19, 2005

The Plaintiffs,
Thomas Roy and Lisa Roy,
By their attorney,
Joseph G. Abromovitz, P.C.

The Defendant,
Delaware North Companies, Inc.
By their attorney,
Morrison Mahoney, LLP

s/Joseph G. Abromovitz
Joseph G. Abromovitz
858 Washington Street, 3rd Fl.
Dedham, MA 02026
Phone: (781) 329-1080

s/Lawrence Boyle
Lawrence Boyle
250 Summer Street
Boston, MA
Phone: (617) 439-7500